

January 10, 2004

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22E

I do not believe that the proposed Standard Air Contaminant discharge permit should be granted to the COB Energy Facility, LLC. Since the DEQ is responsible for enhancing and protecting Oregon's air and water quality, I believe the goals cannot be accomplished by granting this permit for this area. The Bonanza area is one of the ever dwindling pristine farmland areas left in Oregon. The permit applicant has chosen an area that would be grossly inconsistent with the goals of the DEQ. Fewer and fewer pristine farmland areas exist in our state, and they are precious to our economy and to our way of life. The nearest large scale polluter equivalent to the proposed COB Facility is approximately 40 miles away in Klamath Falls. If this facility exists anywhere, it needs to be located in such an industrial area, not in the middle of alfalfa fields. From the DEQ's own chart included in the Notice of Public Hearing, only 2 of the listed 7 pollutants are below the SER, and that is barely below. For particulate matter, PM, the proposed SEL-significant Emission Level- is 644% of the allowable SER; significant emission rate.:

For PM10, Fine Particulate Matter, it is 1,073% of the SER,

For NOx, Nitrogen Oxides, it is 898% of the SER,

For CO, Carbon Monoxide, it is 318% of the SER,

For VOC, Volatile Organic Compounds, it is 242% of the SER.

And even though this would subject the facility to the regulations of PSD, Prevention of Significant Deterioration, no true prevention can be approached reasonably in such a pristine and unpolluted area.

22F

I do not think that the issue of the non-attainment area has been correctly addressed. Klamath Falls has been many times recorded each fall and winter due to wood burning for heating homes to be an area where the National Ambient Air Quality Standards (NAAQS) have been violated or have approached violation. There have been many so-called "yellow" and "red" days, when burning wood has been restricted or not allowed unless it is the only method of heat available to the home. Bonanza has similar smokey days during the cold and snowy winters, but has had no government measurements regarding ambient air quality standards as Klamath Falls has had, and may in fact be a non-attainment area in its own right. Yet the applicant suggests that its own ambient air quality analysis showed the facility will not cause a significant impact on any non-attainment area. Also, during years of forest fires and brush fires, additional smoke that cannot be ignored in any assessment, must be considered in any determination regarding a non-attainment area, or an area approaching non-attainment status.

22G

On October 16, 2003, the Herald and News newspaper in Klamath Falls reported on the wastewater disposal problems of Masami Foods located in Klamath Falls. The DEQ fined them for this problem. Masami Foods used land application of nutrient rich and salt-laden wastewater. For nearly two years, Masami spread wastewater on land which contaminated groundwater with excessive levels of nitrate, sulfate and chloride. Hay yields on the field declined from 19.2 tons in 2000, to zero in 2002. Masami was using too small a field, a 15 acre field, and has now received approval to apply effluent on a 32 acre field. This has produced a clean up situation, but the damage has already been done.

COB Energy Facility, in the Amended Application, proposes to evaluate land application of wastewater, leaving such a process open to them for use if they so choose. Will this become another Masami Foods incident? Who was doing the monitoring? Who was doing the testing? Who was their watchdog? Will using a new area with 32 acres, produce the same results in twice the time? I don't want to see such a situation in Bonanza, with the problem being patched and patched, with more damage being irreversibly done. Much of the testing will be done by the COB Facility itself, this is at best a dubious procedure, like the fox watching the hen house.

Please deny this permit that would put an undue, unnecessary and pollution-filled burden on this small and pristine farming community. Thank you.

Margaret Tenold, PO Box 403, Bonanza, OR 97623

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The COB draft Standard Discharge Permit does not adequately address the PM2.5 that was introduced in 2002. This must be included in calculating the Air Quality Index parameters for the COB and is a more protective health safeguard than PM10. Our prolonged inversion situations cannot always be forecasted with accuracy. On page six, the air quality index of the city of Klamath Falls showed many days over 100 which just meets NAAQS. Fifteen days in the unhealthy range puts too much a strain already on a single forest fire complex. This is also only Klamath and does not reflect necessarily Bonanza and the COB site. Air movement pushed the smoke all the way to Lakeview, with the same number of fire days reflected. Klamath Falls was a non-attainment area and just recently got redesignated for CO. EPA has not designated PM2.5 attainment areas yet, and what the data indicates may or may not be the true data for 2002-2003 or beyond.

On page 13, one remaining non-attainment community is Klamath Falls which has a plan in development for PM10, but not for PM2.5 which should be addressed in the permit.

In 1995, the Federal Title V Operating Permit was instituted by Oregon. COB has the potential to emit 100 tons per year of particulate matter and should be held to Title V specifications. The major source threshold level could be reached by the COB if any of the safeguards malfunctioned for even a limited amount of time.

Klamath Falls on page 17 has made great strides in ameliorating one of the worst wintertime smoke-related air quality problems in the nation!!! The resultant particulates of this time period have already affected many ecosystems. The citizens worked hard to turn this trend around. The COB will reverse this trend. The health effects of particulates vary. The chemical composition of

the particulates emitted by the COB has not yet been adequately addressed. As the corrosion effect of TSP continues to occur on the physical plant itself, more pollution will occur. What is the heat source inside the plant and offices to be used in the COB? What additional heating effect on the environment will this have and on the efficiency of stack combustion? Also in the area are a multitude of cows which also produce methane gas from digestion and elimination. This has not been added to the natural sources of CO which are spontaneous oxidation of naturally occurring methane. There are also large areas of swamp gas emitting wetlands in and around the Bonanza area. Many ranchers have let pastures revert to swamp/wetlands to accomodate waterfowl. There are also many diesel fired tractors, trucks and trailors used year round in farming and in snow removal which are privately run and little regulated on private lands. Ozone can be additionally detrimental to individuals involved in strenuous activity such as cowboys, cow ranchers, hay buckers, etc. in an agricultural setting, more than in other areas.

Measurements taken at the COB stacks are fine, but what about the ozone formation from NO2 at various distances from the stacks. Why has the EPA and the DEQ repealed its standard for non-methane hydrocarbons?

On page 23, there are 16 toxic air pollutants in Oregon's air at levels more than 10 times the federally determined safe levels. Many of these are ones that the COB will add to the immediate and surrounding atmosphere. It is realized that estimates are understated because some of the same pollutants are at even higher concentrations than predicted.

The 1991 budget cuts eliminated DEQ's noise program. Which of our local enforcement officials are now responsible and why does the permit not make any mention any requirement that the permittee must approach such officials with equivalent or stricter standards than the DEQ would now have if it continued its program? This should be part of the permit.

The levels of stress that the COB will force upon the community has not been addressed when due to only air quality itself. This should be addressed and has much merit. Farmers will leave the area as the pollution grows greater and threatens their livelihoods. In Table 4, the sulfur dioxide in the 24 hr. average is not to be exceeded more than once a year as is the CO in its column. This is probably impossible to maintain. The COB would violate this in a forest fire or wood smoke season easily.

The location of the Petersen School for measurement data would not seem to be the best area for the worst case scenario measurement. Ask any Klamath Falls resident. Yet, Klamath Falls have 12 excedences in 2002 alone. This must be factored in to any scenario. In Appendix 1B, again the PM10 was sky high during

the incident of fire. The same occurred for Light Scattering. On page 68, the Surveillance Network shows no measurements at either location, Peterson School or Hope Street, for SO₂, NO₂, O₃, HAPs or PM_{2.5}. There must be such measurements before proceeding to accurately assess the COB situation. Thank you.

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-----Original Message-----

From: Lyn Brock [mailto:brock@kfalls.net]
Sent: Tuesday, February 10, 2004 6:55 PM
To: McKinney, Thomas - KEC-4
Subject: COB Draft EIS comments

Tom,

I am sending these attached comments to you because an email address for submission was not printed in the DEIS.
Would you please see that the responsible person receives these comments. If you have any problems opening or reading the comments please reply via email to brock@kfalls.net.

Thank you,

Bill Brock
POB 212
Bonanza, Oregon 97623
brock@kfalls.net